



**John E. (Jeb) Benedict**  
Suite 250  
1099 New York Avenue, N.W.  
Washington, DC 20001  
Phone 202-429-3114

Vice President – Federal Regulatory  
Affairs & Regulatory Counsel

*Via ECFS*

April 3, 2019

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 12th Street, SW,  
Washington, DC 20554

RE: *ARMIS Operating Data Report (FCC Report 43-08, Table III),*  
CC Docket No. 86-182  
*Revision of ARMIS Annual Summary Report (FCC Report 43-01, Pole*  
*Attachment Data),* CC Docket No. 86-182

Clarification Regarding CenturyLink's Submission of April 1, 2019

Dear Ms. Dortch:

Pursuant to the Public Notice of December 17, 2014,<sup>1</sup> CenturyLink submitted on April 1, 2019, in the above-captioned proceeding, its certification and annual submission of pole attachment data reflecting pole and conduit rental calculation information for the period January 1, 2018 to December 31, 2018.

CenturyLink clarifies how its ARMIS summary worksheets were labeled in the Financial Information section. Although all submitted data is accurate, the Depreciation Rates for Poles and Conduit were listed as whole percentages and in only some instances expressed in thousands (\$000). And, the Depreciation Rate for Poles and Conduit (Rows 301 and 302) should have been shown as whole percentages, instead of as factors. For Bureau staff familiar with the data, the format differences will be obvious and they will automatically adjust their interpretation of the data accordingly. To ensure a complete and accurate record in CC Docket No. 86-182, CenturyLink is submitting this clarification.

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<sup>1</sup> *Wireline Competition Bureau Announces the Effective Date for Transitioning ARMIS Filings from the Electronic ARMIS Filing System to the Electronic Comment Filing System and a Change in Docket Number for Filing Pole Attachment Data*, CC Docket No. 86-182 and WC Docket No. 07-204, Public Notice, 29 FCC Rcd 15272 (Dec. 17, 2014). This change was adopted in the *ARMIS Procedures Order*, 29 FCC Rcd 11436 (rel Sept. 24, 2014).

Marlene H. Dortch

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Please contact me if you have any questions concerning these matters.

Sincerely,

/s/ John E. Benedict

cc: Kris Monteith, Bureau Chief, Wireline Competition Bureau